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Subject: SBX7-7 Concepts

Gentlemen,

Here is what I consider to be the bare basis for the SBX7-7 agriclultue reporting requirement. Beyond this it is getting far too complicated and complex.

Very Simply:

- ***A reliable and repeatable* water delivery accounting system must be used to monitor and report water deliveries to customers.**
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- **The DWR considers an acceptable water delivery accounting method to be accurate within +/- 15 per cent.**
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- **For pressurized delivery systems, acceptable water delivery accounting methods include flowmeters, or clocks which totalize pump run time.**
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- **For gravity flow delivery systems, acceptable methods include, but are not limited to, the use of rated water control structures such as meter gates.**
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- **All water control structure rating curves shall be certified by a Professional Engineer.**
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- **Such rating curves for water control structures shall consider multiple headwater/tailwater conditions indicative of their site specific conditions.**
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- **Irrigation delivery quantities will be calculated based on actual field conditions.**
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- **Water purveyors must submit documentation of their various water delivery accounting methods and calibration methods used as a part of their Agricultural Water Management Plan, which are updated every five years.**

I would like to see these very simple concepts brought into the language of the draft regulation.

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